

LEVIN-EPSTEIN & ASSOCIATES, P.C.

420 Lexington Avenue • Suite 2525 • New York, New York 10170
T: 212.792-0046 • E: Jason@levinepstein.com

July 27, 2020

Via Electronic Filing

The Honorable Judge Gabriel W. Gorenstein
U.S. District Court Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *De La Rosa v. Aspenly Co. LLC et al*,
Case No.: 1:18-cv-03456

Dear Honorable Judge Gorenstein:

This law firm represents Defendant Pure Green NYC 8th Street Corp (the “**Defendant**”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(A) and (E), this letter respectfully serves to request an extension of time to complete expert fact discovery from June 15, 2020, to, through and including, August 31, 2020.

This is the sixth request to extend the discovery deadline. Plaintiff’s has objected to this request, on the basis that “fact discovery is over”. This request, if granted, would affect the existing July 29, 2020 pretrial submission deadline.

The basis of this request is that the COVID-19 pandemic has complicated Defendant’s ability to conduct further discovery. Additional time is needed to mobilize Defendants’ experts to survey the subject premises, prepare an expert report, and complete expert depositions.

As such, Defendant respectfully requests that: (i) the fact discovery deadline of June 15, 2020 be extended to, through and including, August 31, 2020; and (ii) the July 29, 2020 pretrial submission deadline be extended to, through and including, October 15, 2020.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi, Esq.
420 Lexington Avenue, Suite 2525
New York, NY 10170
Tel. No.: (212) 792-0048
Email: Jason@levinepstein.com
*Attorneys for Defendant Pure Green NYC
8th Street Corp.*

VIA ECF: All Counsel